

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**SIMON GREENSTONE PANATIER, PC**

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**In Re:**

**Imerys Talc America, Inc.**

**JAMES D. HUFF**, Individually and as Administrator  
and Administrator ad Prosequendum of the Estate of  
**LINDA KAY HUFF**, Deceased,

Plaintiff,

v.

**ARKEMA, INC.** f/k/a PENNWALT  
CORPORATION and ELF ATOCHEM NORTH  
AMERICA, INC. (sued individually and as successor-  
by-merger to WALLACE & TIERNAN d/b/a WTS  
PHARMACRAFT);

**BRENNTAG NORTH AMERICA, INC.** (sued  
individually and as successor-in-interest to MINERAL  
PIGMENT SOLUTIONS, INC. and as successor-in-  
interest to WHITTAKER CLARK & DANIELS,  
INC.);

**BRENNTAG SPECIALTIES, INC.** f/k/a MINERAL  
PIGMENT SOLUTIONS, INC. (sued individually and  
as successor-in-interest to WHITTAKER CLARK &

**Case No. 19-01583-KCF**

**Lead Case No: 19-10289-LSS**

**Chapter 11**

**Hearing Date: June 25, 2019**

**Judge: Hon. Kathryn C. Ferguson,  
Chief Judge**

**MOTION TO REMAND**

**Oral Argument Requested**

**DANIELS, INC.);**

**COLGATE-PALMOLIVE COMPANY;**

**CYPRUS AMAX MINERALS COMPANY** (sued individually, doing business as, and as successor to AMERICAN TALC COMPANY, METROPOLITAN TALC CO. INC. and CHARLES MATHIEU INC. and SIERRA TALC COMPANY and UNITED TALC COMPANY);

**IMERYS TALC AMERICA, INC.** (sued individually and as successor-in-interest to LUZENAC AMERICA, INC. successor-in-interest to CYPRUS INDUSTRIAL MINERALS COMPANY and WINDSOR MINERALS, INC.);

**JOHNSON & JOHNSON;**

**NOVARTIS CONSUMER HEALTH, INC.;**

**TOPCO ASSOCIATES LLC;**

**TOPCO HOLDINGS, INC. (COOPERATIVE);**

**WHITTAKER CLARK & DANIELS, INC.;**

**GSK CONSUMER HEALTH, INC.,** sued individually and as successor-in-interest to NOVARTIS CONSUMER HEALTH, INC.;

**PREMIER BRANDS OF AMERICA INC.;**

**DAVION, INC.;**

**THORNTON INDUSTRIES, INC.;**

**JOHN DOE CORPORATIONS 1-50** (fictitious);

**AVENTIS INC.;**

**BARRETT'S MINERALS INC.;**

**FISONS CORPORATION;**

**NOVARTIS CORPORATION** (sued individually

and as successor-in-interest to CIBA-GEIGY CORPORATION and its subsidiaries CIBA CONSUMER PHARMACEUTICALS and CIBA SELF-MEDICATION, INC.);

**PFIZER INC.;**

**SANOFI-AVENTIS U.S. LLC** (sued individually and as successor-by-merger to AVENTIS PHARMACEUTICALS INC.);

**SPECIALTY MINERALS INC.** (sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.),

Defendants.

**TO:** All Counsel via Electronic Filing, Federal Express and Email:

**PLEASE TAKE NOTICE** that, on June 25, 2019 or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiffs shall move pursuant to D.N.J. LBR 9013-2 before The Honorable Kathryn C. Ferguson, United States Bankruptcy Court for the District of New Jersey, for an Order remanding the case back to the Superior Court of New Jersey, Middlesex County.

**PLEASE TAKE FURTHER NOTICE** that the undersigned will rely upon the accompanying Certification of Leah Kagan, Esq. and Brief in support of this motion.

A proposed form of Order of Remand are enclosed.

SZAFERMAN, LAKIND,

BLUMSTEIN & BLADER, P.C.

Attorneys for Plaintiffs

By: s/ Arnold C. Lakind  
Arnold C. Lakind, Esq.

Dated: 5/23/19